

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on December 23, 2008.

Permit Number: **R30-09300004-2008**

Application Received: **June 2, 2011**

Plant Identification Number: **03-54-093-00004**

Permittee: **Kingsford Manufacturing Company**

Facility Name: **Parsons Plant**

Mailing Address: **P.O. Box 464, Parsons, WV 26287**

Permit Action Number: *MM02*      Revised: *October 1, 2012*

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Physical Location:	Parsons, Tucker County, West Virginia
UTM Coordinates:	613.2 km Easting • 4326.2 km Northing • Zone 17
Directions:	The Facility is located on Route 219, about 2 miles South of Parsons

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### Facility Description

The Kingsford Manufacturing Company Parsons Plant is a charcoal manufacturing facility. It manufactures charcoal briquets from raw materials including wood/sawdust, char produced on-site and received from the Beryl plant, coal, limestone, sodium nitrate, starch, borax, and solvent for briquets.

Facility SIC Code: 2861 Chemicals and allied products - gum and wood chemicals.

The proposed Title V modification incorporates changes associated with the administrative update R13-1608F for the installation of an additional fabric filter to the existing finishing briquet handling/packing in-feed conveyors. Permit R13-1608F was also updated to the new boilerplate format. This Title V modification also incorporates the changes associated with the conversion of Permit R13-1608E from the old format to the new boilerplate format in R13-1608F.

## Emissions Summary

This modification does not change the total emissions from the facility.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of PM<sub>10</sub> and NO<sub>x</sub>. Due to this facility's potential to emit over 100 tons per year of one or more criteria pollutants, Kingsford Manufacturing Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits For Construction, Modification, Relocation And Operation Of Stationary Sources Of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, And Procedures For Evaluation
	45CSR7	To Prevent And Control Particulate Matter Air Pollution From Manufacturing Processes And Associated Operations
	45CSR30	Operating permit requirement.
State Only:	N/A	

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-1608F	September 14, 2011	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

### Determinations and Justifications

- 1) The “Emission Units” table was updated to include the new baghouse and associated emission point. A row was added for Source ID “E-08-03H” (emission point “S-35”). The “Equipment Description and ID,” “Year Installed/Modified” and “Design Capacity or Allowable Limit” information reflects that of the existing equipment which was installed in 1977.
- 2) Condition 8.1.4. was added to the Title V permit as a new requirement from Permit R13-1608F, which establishes a PM/PM<sub>10</sub> pounds per hour limit as well as a visible emission limit for the new fabric filter emission point S-35. The visible emissions limit and the PM limit of 45CSR7 (i.e., §§3.1. & 4.1.) will be streamlined with the more stringent limits of R13-1608F.
  - Compliance with the PM/PM<sub>10</sub> limit and the 20% opacity limit will be demonstrated through daily visible emission checks using Method 22-like procedures to verify that there are no visible emissions. No visible emissions will provide a reasonable assurance of ongoing compliance with the PM/PM<sub>10</sub> lb/hr limit and the opacity limit. If visible emissions are present during these checks or at any other time visible emissions evaluations in accordance with 45CSR§§7A-2.1.a. and 2.1.b. shall be conducted immediately. Such evaluations shall not be required if the visible emissions condition is corrected as expeditiously as possible and the cause and corrective measures taken are recorded. The 45CSR7A evaluations shall be conducted during periods of facility operation. (See condition 8.2.7. which has been added to the permit.).
- 3) The R13-1608F revision also converted R13-1608E to the new permit boilerplate format. During this process, some of the language was revised and/or new requirements added (see conditions 3.1.9., 3.1.11., 3.1.14., 3.1.21., 3.4.1., 3.4.2., 3.4.4., 3.4.5., 3.4.6., 4.4.2., 5.1.5., 5.2.4., 5.4.1., 6.2.1., 6.4.2., 8.1.1., 8.2.3., 8.2.4., and 9.2.1.). Also, some requirements were deemed to be no longer applicable and were deleted from R13-1608F. Therefore the corresponding requirements were deleted in the Title V permit (i.e., conditions 3.3.3., 3.3.4. and 5.3.2.) and/or the R13-1608 citations of authority were deleted (i.e., conditions 3.1.11., 3.1.12., 3.1.13., 3.1.18., 3.3.2. and 5.1.4.).
- 4) Permit R13-1608F contains in Appendix A, an example form for keeping records of opacity observations. Since the use of the form is not a requirement, the form was not included in the Title V permit.
- 5) The address for USEPA in condition 3.5.3. has been updated.

### Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

- 40 CFR Part 64 CAM determinations are not applicable for minor modifications.  
(Note: A CAM determination should be made during the next permit renewal.)

### Request for Variances or Alternatives

None.

### Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### Comment Period

Beginning Date: Not Applicable for minor modifications.  
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Frederick Tipane  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Frederick Tipane  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. (1215.) • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

Not applicable.